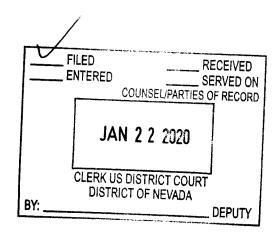
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1 Brian R. Morris, Esq. Nevada Bar No. 5431 5455 S. Fort Apache Rd. 108-151 2 Las Vegas, Nevada 89148 (702) 551-6583 3 brmorris@lawforthepeople.com (Local Nevada co-counsel) 4 L. Carmen Ramirez, Esq. California Bar No. 264593 (Admission to Nevada pending) 6 Law Offices of Kelsey & Ramirez, LLP 712 W. 23rd Street 7 Merced, California 95340 T: (209) 383-0110 8 Fax: (209) 383-0210 Attorneys for Defendant JM Construction 9 Engineering, Inc., a California corporation 10



#### UNITED STATES DISTRICT COURT

#### DISTRICT OF NEVADA

STELLAR SNACKS, LLC, a Nevada limited liability company,

Plaintiff,

vs.

JM Construction Engineering, Inc., a California corporation, and JOHN DOES 1-10, inclusive,

Defendants,

Case No. 3:19-cv-00716-MMD-CLB

STIPULATION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING (First Request)

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Pursuant to Local Rule IA 6-1, Counsel for Plaintiff Stellar Snacks, LLC, through counsel of record Michael A. Burke, and Defendant's Nevada counsel, Brian R. Morris with attorney L. Carmen Ramirez, a California attorney awaiting approval to appear in this case, agree and stipulate that the due date to file a responsive pleading to the Complaint (ECF No. 1) as well as Defendant's Certificate of Interested Parties will be extended by twenty-one (21) days. This is Defendant's first request for an extension to file a responsive pleading as well as the Certificate of Interested Parties. The original due date was January 7, 2020 and the new requested due date is January 28, 2020.

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On January 2, 2020, Plaintiff gave Defendant an oral extension to file a responsive pleading and requested Defendant prepare a proposed Stipulation and Order reflecting the agreed upon

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extension. However, Defendant's counsel hereby represents that it was just able to locate and secure local co-counsel last Friday (January 17, 2020) to be able to draft and have this Stipulation approved by 2 Plaintiff's counsel. Thus, this Stipulation is being filed now. Ms. L. Carmen Ramirez has filed her 3 Verified Petition for Permission to Practice in this Case (ECF No. 8). A proposed Order is attached hereto as Exhibit1. 5 The parties further stipulate and agree that this stipulation is entered into in good faith and not 6 for the purposes of unnecessary delay and that neither party will be prejudiced by order of the Court 7 approving the proposed stipulation. 8 9 10 Dated this 21st day of January, 2020. Dated this 21st day of January, 2020. 11

By: /s/ Brian Morris Brian Morris, Esq. 5455 S Fort Apache Rd, Ste 108-151 Las Vegas, Nevada 89148

Local Attorney for Defendant

By: /s/ Michael A. Burke Michael A. Burke, Esq. 71 Washington Street Reno, Nevada 89503 Attorneys for Plaintiff

Robinson, Sharp, Sullivan & Brust

IT IS SO ORDERED

D STATES MAGISTRATE JUDGE

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## **Index of Exhibits**

# **Exhibit**

1. Proposed Order

Exhibit 1

Exhibit 1
Proposed Order

Exhibit 1

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1 UNITED STATES DISTRICT COURT 2 DISTRICT OF NEVADA 3 STELLAR SNACKS, LLC, a Nevada limited 4 liability company, Case No. 3:19-cv-00716-MMD-CLB 5 Plaintiff, 6 ORDER GRANTING EXTENSION OF vs. TIME TO FILE RESPONSIVE PLEADING 7 JM Construction Engineering, Inc., a California) corporation, and JOHN DOES 1-10, inclusive, 8 Defendants, 9 10 Pursuant to Local Rule IA 6-1, Counsel for Plaintiff Stellar Snacks, LLC, through counsel of 11 record Michael A. Burke, and Defendant's Nevada counsel, Brian R. Morris with attorney L. Carmen 12 Ramirez, a California attorney awaiting approval to appear in this case, have agreed and stipulated that 13 Defendant may have through January 28, 2020 to file a responsive pleading to Plaintiff's Complaint 14 (ECF No. 1) as well as file its Certificate of Interested Parties. Based upon the Stipulation (ECF No. 9) 15 and good cause appearing, 16 IT IS SO ORDERED 17 18 19 20 21 22 United States Magistrate Judge 23 24 25 26 27 28